

JULIE BISLAND: Good morning, good afternoon, good evening everyone. Welcome to the transfer policy review PDP working group call taking place on Tuesday, the 29th of October 2024, we did not receive apologies for today's call. As a reminder, the alternate assignment link is available in all meeting invite emails. Statements of interest must be kept up to date. Does anyone have any updates to share? If so, please raise your hand.

JOTHAN FRAKES: Yes. I have an update that and I need to update my statement of interest, but I am now a member of the Security and Stability Advisory Committee. Thank you.

JULIE BISLAND: Thank you, Jothan. All members and alternates will be promoted to panelists observers will remain as an attendee and will have access to view chat only. Please remember to state your name before speaking for the transcription. All chat sessions are being archived. And as a reminder, participation in ICANN, including this session is governed by the ICANN expected standards of behavior and the ICANN anti community or anti harassment policy. Thank you. And over to our chair, Roger Carney. Please begin, Roger.

ROGER CARNEY: Great. Thanks, Julie. Welcome, everyone. Okay. I don't have a whole lot to say. I know that the homework assignment was just a few recommendations, but there were a lot of comments on these recommendations. So I think it was fitting that the smaller number was fitting due to the larger amount of comments that we're going to have to process here. So Other than that, I don't really have anything to start out with. So I think we can go ahead and jump into where we left our conversation last

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week on our recommendations and get through those and then on to this week's homework assignment. So I think I will turn this over to Caitlin to take us through the remaining Recs from last week's homework.

CAITLIN TUBERGEN: Thank you, Roger. This is Caitlin Tubergen for the transcript. We ended on recommendation 17 last week. So we'll start today's discussion at recommendation 18. We received a lot of comments on recommendation 18 which again isn't a surprise because this was a recommendation that the working group discussed at length. There are some differing opinions in the working group. So not surprisingly, those differing opinions extended to different public commenters. So at a high level as a reminder, recommendation 18 is about the transfer restriction after an interregistrar transfer. The working group is recommending to lower that restriction from 60 days to 30 days, but to make it mandatory instead of optional. So at a high level, there were some commenters that believe there should be no restriction after an interregistrar transfer. Some noted that the purpose of the transfer policy is to allow for transfers and for consumer choice and putting restrictions on that is not desirable. Some of the commenters noted that in the event the working group does decide to maintain this recommendation and this restriction, that there needs to be more rationale included as to why the working group thinks this is necessary. Because a couple of commenters noted that the current rationale in the report is not enough, or at least is not convincing enough to explain why this restriction is needed.

A couple of the other comments. Similar to previous comments. There's a note about communicating deadlines or time limits within days and recommends keeping just hours. There was a comment about concerns with compliance enforcement, particularly around 18.3 which provides that the specific requests include a reasonable basis for removal. This particular commenter was concerned with what "reasonable basis" means and suggested some language be added there, which we'll talk about in a minute about what that means. There was also a comment that thinks that this must be a mandatory restriction that there shouldn't be any ability to lift the restriction for the safety of the registered name holder because double name hijacking, I believe, is what the commenter referred to it as or double hijacking where the name

holder is not able to lift the restriction. In order to restrict that option by a bad actor, this restriction should be mandatory and the ability to remove the restriction should not be considered.

There was also a comment about, however, the working group and like recommendation three and recommendation 18 should essentially be mirrors of one another. So the initial restriction after a name is registered and the restriction after a name is transferred should be similar to avoid confusion. I think that is a high level of what the comments were. But if anyone in the working group had any additional context to add to either their comment, or maybe I missed something that you remember reading as part of the homework, I'll pause for a moment before going over some of the suggested edits to allow for additional comments. Okay, I don't see any raised hands. So we will move to the yellow box, which is some of the proposed updates.

So for recommendation three, there were a couple of prepositional suggested changes. So changing "within" to "for" and "of" to "from". Those changes, again, because this commenter is noting that the recommendation should essentially be mirrors of one another. Last week we discussed those prepositional changes and there were no objections as they seem to make the recommendation more clear. Additionally, you'll notice some highlights where 30 days has been changed to 720-hour restriction across the board. The second sentence of the recommendation has been crossed out and removed to implementation guidance, as that was a suggestion from one of the commenters that that language is more appropriate for implementation guidance, rather than in the body of the recommendation. Recommendation or excuse me, 18.3 was the commenter who is concerned with the terminology "reasonable basis" as that leaves too much to the subjective opinion of a registrar actor. So that commenter suggested the language that you see highlighted, noting that there are limited reasonable bases for restricting or removing the restriction. So we can talk about those. But that was essentially a copy and paste from that commenter. And I think that includes all of the updates that we made as a result of comments. So I will pass it back over to Roger to see if anyone has any reactions to the changes here. Thank you.

ROGER CARNEY: Great. Thanks, Caitlin. Again, some of them seem pretty standard for the hours. Those things seem pretty standard and it does make it more consistent. So that's nice to have. The big strike out of line two, it seems okay to me, I would say that doesn't seem like too much of a stretch and it's not policies so much as just implementation. So I think that would make sense if it moves to implementation guidance. But again, we're wanting to hear from anybody that disagrees or agrees with that.

Probably the big thing is on 18.3, you know, do we really want to make this a list of things or are we comfortable under the reasonable basis that, you know, sort of exist elsewhere, but understanding, you know, if you can come up with a list that's much better. But, you know, are we willing to go to that spot. And is this the right list if we are? It seems very focused on aftermarket or acquisition issues of a domain name and it seems like there are other reasons for a possible lifting of this. So Ken, please go ahead.

KEN HERMAN: Thank you, Roger. It's Ken Herman for the record. It was my stakeholder group that suggested the change to 18.3. Yeah, we're highly uncomfortable with a just broad, anything that anybody can think of can lift the restriction. And we felt that was just a bridge too far. The list there is drawn exclusively from the guidance or the rationale text that was as part of the report. So the feeling amongst the constituency was that, well, these are the reasons why we could lift the restriction, then they're fine as far, so why not just make it the, those are the restrictions. We do that in other places, 21, I think as well. We're very specific about what things can happen. I understand there might be the risk of future coming up with ideas about reasons why people would want, but I think it behooves us to kind of come up with those reasons that we can lift a restriction. People have transferred, made the transfer for a particular reason, and if we're going to keep the ability to, in our view, if we're going to keep the lifting, then fine. Let's just make it clear about what the reasons are for doing that and not just leave it really at

the discretion of the registrars in general. So that's basically the background. The real point is that the items there are what was in the text of the document. So thanks.

ROGER CARNEY: Thanks, Ken. I appreciate that extra context. And now we'll jump over to Theo. Theo, please go ahead.

THO GEURTS: Yeah. Thanks. And thanks, Ken, for sort of giving us a little bit of an introduction there on what the thinking was of the people in your stakeholder group. I think I am okay-ish with this, but maybe somebody needs to double check me. But apparently, from what I'm reading here, if we put some stuff in our acceptable use policy or TOS, where we sort of have issues with certain domain names and they transfer into us and we don't want them for whatever reason, because it could be local law is already mentioned there, but it could be also outside local law, then we can remove the restriction anyways. That's at least what I'm getting out of this, and that should be something we should aim for, in my opinion. If I got it wrong, glad to hear it. It's been a long day for me, so I'm not 100% up to speed at the moment. Thanks.

ROGER CARNEY: Great. Thanks, Theo. Please go ahead.

ZAK MUSCOVITCH: So I guess there's two kind of parallel issues with the 18.3. So on one hand, there's the concern that the discretion could be exercised more restrictively by the registrar, because the registrar can say, okay, well, you provided me with your reasonable basis, but we're still going to deny the request, because at the end of the day, it's still a request and the registrar retains ultimate discretion on whether

to agree to the request. And on the other hand, there's the concern that by not limiting what's reasonable, it provides the registrar with an expanded scope for exercising their discretion, and that seems to me to have been the impetus for the suggested additions to 18.3, the itemization. What I'm wondering, and I'm really kind of thinking out loud here, is that if at the end of the day, it's ultimately up to the registrar whether they're going to permit this request, regardless of whether we've specified specific limited circumstances that are considered reasonable or not, is it possible, or can someone point out an issue or concern if we kind of flipped it and reversed it so that the language would say something to the effect of a registrant shall be entitled to the removal of the restriction subject to the discretion of the registrar, or the registrant shall be entitled to removal of the restriction unless the registrar provides a specific reason why it's disagreeing? So by, and this is kind of, I haven't thought this through, but if we flipped it and put the onus on the registrar to come up with an explanation about why it's going to deny the request, rather than put the onus on the registrant to provide a quote-unquote reasonable basis for the request, would that be a superior solution? Thank you.

ROGER CARNEY: Great. Thanks, Zak, and thanks for thinking on the spot and throwing out some ideas there. My first thought when you said that was, okay, does that change our intent of there being a lock? I mean, does it become more of a, the lock becomes optional when you say, when you flip this logic here in 18.3? And again, I'm just thinking as you were talking, so I don't know if that's true or not. So Rich, please go ahead.

RICH BROWN: Kind of agreement with you, Zak, there is kind of this middle area that we seem to be debating around. And as I recall in our previous debates on this issue, obviously a lot of people on the panel represent registrars, so a lot of that was expressed. The main reason is registrars wanted a reason to be able to remove the hold early. But then it became an issue of, well, do we list every reason? Do we not? What are we going to forget? This listing of new reasons seems like we're going backwards to that,

where we're now moving away from the original idea, which was, first of all, there are many things in other policies and laws that overwrite this regardless. So pointing to local law or other governance issues that might overwrite this, I don't think we need to state that. It's already well-known and established. Kind of losing my train of thought here. But anyway, if we look at 18-4, this was kind of the result of our previous debate. We realized we can't really make an exhaustive list, because nobody will agree that it's 100% accurate and that it won't change. I think we can agree on that. That's why we put in that protection that the registrar must get notice, must save those notices, be able to present upon investigation why they decided to remove or circumvent the 30-day pause. So it's not just a registrar can make a decision and go, boom, remove the hold, and there's no chance that they'll ever be called to task on that. So I just wanted to add that as a reminder into this conversation. Thank you.

ROGER CARNEY: Great. Thanks, Rich. Steinar, please go ahead.

STEINAR GROTTROD: Yeah. Hi. First of all, I have a question. I'm curious, if a domain name is going to be transferred to a registrar and this new registrar lift the transfer lock and then it's been transferred, I assume, back to the previous registrar, will that be another year in the lifecycle, hence a cost element? That is the question I have. But I also want to say that my understanding is that the main goal here is to have a 30-days lock. And there should be very special cases, not necessarily listed, that the present registrar could then lift the transfer lock. So I'm not sure whether we maybe put that into a wording where it is somehow special. It must be documented as in 18.4, but somehow special to lift the transfer lock after a transfer. Thank you.

ROGER CARNEY: Great. Thanks, Steinar. Yeah. And I think when we talked about this, we were set on that, and the ability to break this was a follow-up because everyone did understand and wanted the 30-day lock. And that was something that was the default action is there's a lock, and then there has to be a process and documented reasons that could allow it. The lock is there and then something could happen. But the goal was it's a 30-day lock and we move forward in how we do that. Thanks, Steinar. Jothan, please go ahead.

JOTHAN FRAKES: I kind of had a question for Zak. I mean, I think, I think the objective here when we, when we're thinking it through, if you've got a domain that transfers from registrar A to registrar B and then to registrar C, something where there was an issue anywhere along the line in that transfer, because it's been scrubbed through an intermediary registrar, it really complicates the ability for, you know, registrar A. In fact, even registrar B to do anything for that registrant. And I, you know, if I really think through why we've got this, this 30 day or 60 day or, you know, 720 hour wait, it's really designed to be a safety net or to have some appropriate guardrails or friction to keep, you know, things from happening that, you know, probably we wouldn't want happening. I get that there's probably some interests in ensuring that there's, you know, some frictionless ability to support the marketplace potentially, you know, other rationales here, but, you know, really being able to do anything for the registrant is only within your power as a registrar while the domain is at your registrar. And we were trying to create some places where we could lower that restriction, that lock in order to let that domain go through or block the transfer in order to meet some of the, I don't know, the universe keeps delivering us these strange edge case scenarios where we really need to do something to help a registrant. And we want to not be kept from being able to do that by the wording of policy. So I don't think your idea was bad. The way it's worded here, we kind of thought through and we're trying to say, hey, look, you know, there's a little bit of a safety net, sort of a buffer zone of 30 days, not very long compared to 60 that we can turn off if we need to. But we have to rationalize, you know, what that is and be able to stand up to

the test with compliance, you know, should there be an issue later. And I'll shut up and let you talk, Zak. Thanks for hearing me on that one.

ZAK MUSCOVITCH: Well, thank you, Jothan. I don't want you to shut up at all. Those were great points and good reminders of our earlier discussions and the original rationale for the language we ultimately arrived at. And so what I'm thinking is that there's two essential concerns, as I previously mentioned in my earlier remarks. So for those that are concerned that putting the discretion solely in the hands of the registrar based upon a request from the registrant is too restrictive upon a registrant. In other words, those people that would like to see the registrant be able to transfer it and not be subject to the lack of cooperation or comprehensiveness or discretion of a registrar. Jothan's point about the security that's afforded by their 30 day lock is, of course, material. But on top of that, I think that there's a point that can be made and perhaps a point that can be made in an expanded rationale for this language is that if a registrant makes what it considers an eminently reasonable request to its registrar based upon plenty of verifiable circumstances, for example, and the registrar ignores or capriciously rejects that request, there's an element of self-regulation here in the sense that that registrant, having been treated like that, will then move to a registrar where it won't be treated like that. So if there's a problem for a registrant at a given registrar with a reasonable request not being acceded to, there won't be necessarily a remedy for that particular instance. But going forward, there will be alternatives for that registrant and that will in turn put some additional pressure on registrars to exercise their discretion reasonably. So that addresses one group's concern. The other group's concern is, which is that, you know, by just allowing the registrar to have unlimited discretion, we might see too many acceptances of so-called reasonable requests for transfer. And so that group is more concerned that it's not that there won't be enough acceptance of the request, but too many. And so there might be a piece missing here that relates to compliance in the sense that, you know, and I really hate to request anything that puts more of a reporting obligation on registrars in terms of data, etc., but perhaps there could be consideration that registrars must report how many instances of requests they get and how many instances are denied and accepted, which would at least

provide some data to stakeholders and compliance to help identify whether the policy as it will likely be enacted is working. Thank you.

ROGER CARNEY: Great. Thanks, Zak. And just as a reminder, all four of these bullets go together. So it's not like, you know, the reasonable basis is the only thing that this is done on. I mean, 18-1 and 18-2 have to happen and 18.3 has to happen. I mean, all four of these items have to happen for something to go through, just to make sure everybody's, make sure everybody reads everything as a whole here. So, but Theo, please go ahead.

THO GEURTS: Yeah. Thanks for reminding me there, Roger. And that's exactly what I'm doing. And when I follow my own logic here, when judging 18.1 and 18.2, then at a certain point and then going through 18.4, which is a logical set of instructions there when it comes to the entire thing. But 18.3, it seems to be, on the one hand, it tries to solve a problem that in my opinion is already solved by 18.1 and 18.2. I mean, if the registrar receives a specific request from the registered name holder, whatever that request may be, it is indeed the removal of the restriction, but the reasons there are for the registered name holder unknown, I don't really care. I mean, they probably have a reason and I'm not going to question that reason. So, you know, that sort of makes 18.3 way too specific. And I don't think it's actually really required to have that in here. I think the previous language was better in that way. And to Zak's point, you know, there is always another option for the registrant if they are not happy with a registrar and if that registrar sort of refuses to remove the restriction, well, that registrant can always go to ICANN Compliance. And I don't know about the other registrars here, but I don't like fighting with ICANN Compliance because that's going to cost me a lot of hours and that makes these things extremely expensive. So that's either for me as a registrar, am I going to take the hit of 15 cents here or am I going to spend \$400 on fighting ICANN Compliance, which I don't have any desire to. So that's either for me as

a registrar, am I going to take the hit of 15 cents here or am I going to spend \$400 on fighting ICANN Compliance, which I don't have any desire to. So, thanks.

ROGER CARNEY: Great. Thanks, Theo. And just to follow up on one thing, Zak, I think that, you know, building in the matrix is always great when we go through and create recommendations. I think that the requirement in 18.4 doesn't specifically call that out, Zak, but I think because they have to keep this data for 15 months, ICANN Compliance can look at that and say, OK, how many have you had? So I think that that could happen. But just my thoughts on that. But Ken, please go ahead.

KEN HERMAN: Yeah, thanks. And I appreciate everybody's input on the discussion. This is Ken Herman for the record. Yeah, not quite sure where to go with this. The intent of 18.3, at least in terms of the expansion, as we've discussed, is to try and put some guardrails around it. You know, because you're keeping records, and my understanding is that it becomes a very retroactive kind of activity. Okay, we're going to do some analysis. But what actually, what action can compliance take if it's deemed at some point that, well, you know, that request to follow on the, you know, to accept the lifting of the restriction was really not in accordance with anybody's idea of reasonable, but the domain has already been transferred and there's probably not much that can be done. The idea here is to help understand, at least for the part of the registered name holder, okay, under what conditions is this really going to be a risk to me? And in terms of the, you know, domain name being essentially, you know, improperly transferred in the first place and there was some issue with it and then it gets, you know, transferred again. And as I've heard mentioned, it can cause some difficulty. Yes, no doubt, as Theo rightly says, it's expensive to deal with compliance and I understand and accept that the registrars will do everything they can to avoid that. But at the same time, this is really about, from our perspective, putting some guidelines around it and having some idea of what reasonable might be. To reading the text, it seems to indicate that we've dealt with some of the key issues. It's basically, we're saying, you know, it has to do with either a purchase issue or

a, you know, compliance with local acceptable use policies. And I think that shouldn't be unreasonable because they're broad enough categories. At least that's from our perspective.

Zak, I appreciate your thinking outside the box on this. I'd have to think a bit more about what you're suggesting and how that impact would be. And I'd welcome some initial, you know, some further rather discussion about it. Maybe not here at this moment, but going forward to give us a better idea as to some ways that we can keep some guardrails that, from the RNH's perspective, make things a bit easier, but also allow for the kinds of things that, what I'm hearing here in terms of the need to really remove the restriction and let people get on with their business. Thanks so much, everybody.

ROGER CARNEY: Thanks, Ken. I appreciate that. And yeah, and I agree. And I think that we've got a good talking point. And again, we don't have to solve it today. It's good that people are thinking and discussing it. Obviously, to me, you know, the easy things are the things outside of 18.3 here. But I think also, again, as I mentioned in the last time, 18.3 is not an isolated event. It has to go with all of 18. So read it as a whole. And I think, you know, there's a lot of protections in 18.1 and 2 that may help that. But again, I don't want to end this discussion because I think it's great. So I think, as Ken just said, think about it. Think about it as it goes. Let's leave this 18.3 open for now. And we'll come back to it as people can think about it. Otherwise, I think the other items seem like we can go ahead and accept those changes. But let's come back to 18.3 as everybody has time to think. So, okay. Anything else? Otherwise, I'll turn this back to Caitlin so we can move on to 19. Okay, Caitlin, go ahead and go to 19 for us, please.

CAITLIN TUBERGEN: Thanks, Roger. I'm actually going to go back quickly to 17 because I accidentally skipped. And that, we went over this at the end of last week's call kind of in rapid succession. But 17.5 in particular, Roger had noted that this commenter, and sorry, as a reminder, recommendation 17 is about the losing FOA or what is now going to be called the transfer confirmation. So, the working group is

recommending that this losing FOA with a new title is maintained with a couple of things added and clarified to it. One of the commenters noted that there should be recommendation text that specifically notes that the transfer confirmation, aka formerly losing FOA, must not include a mechanism for immediately approving the inter-registrar transfer. This commenter made the suggestion noting that if the registrant would like the transfer to go through immediately or very quickly, there are ways to reach out to the registrar to make that happen, but including an ability to do that within a notice that could potentially be going to a bad actor is a risk that should not be, or is a risk that should be mitigated by making sure that is not included.

And so, we presented this, and there wasn't really time to discuss. So, if anyone has any reactions to that, you can maybe provide those now. Again, this isn't the end to provide those, but just wanted to see if there were any reactions to that before we go on to recommendation, the next recommendation, 19. Thank you.

ROGER CARNEY: Great. Thanks, Caitlin, and thanks for keeping us honest here and making sure we're hitting all these. Yeah, because we did just read this through, and we kind of left it there, and we didn't have much time to talk about this. So, yeah, I think 17.5 is kind of—and I don't know that we specifically talked about it. I know we talked about the reasons for having it, but we—I don't know if we talked too much about not having a mechanism for immediately approving. It seems to be a bit counterintuitive, and I understand, you know, the commoners' reasons for it, but it seems like the discussions through this, and there was always the ability to accept or deny it right away, either way. So, I don't know. Any thoughts on that from anyone? No one has thoughts on that. Okay. And again, as Caitlin mentioned, we're not done with it. We'll touch on it. To me, it's a tough one just because you're taking that control away, and again, if it's the wrong person, you're obviously trying to stop it, but it seems like you're taking control away of a registrant trying to get something done fairly quickly.

So, Rich, please go ahead.

RICH BROWN: Hi, Rich Brown for the record. To kind of add to this conversation, in the current transfer policy, there, I mean, how do I say? There is not a requirement to send a confirmation, an ACK link, if you will. There is not a requirement to send one, but over the years, many have decided as a means of registrant ease of access or whatnot, started putting those links in. So, like, hey, we understand it takes five days, but you want to make it faster, you can click here and move forward. That's a good thing. The problem is those links, in cases of hijackings, go right to the hijackers. So, just like online phishing attempts or whatnot, where, like, they may notify you, we're with your bank, call us at this number, click here. In reality, if you get something like that, you're supposed to use the actual link, like, from the bank. That's why in the write-up, it says, you know, contact the registrar directly. Also, if it's to be a fast transfer, and forgive the terminology, because I know fast transfer is another term, but just generically, if you want your transfer to go fast, you can contact your registrar, set this up, say, hey, I'm transferring my domain, I've got it, I've submitted it, can you push it through? Anyway, so the suggestion to put this in is just kind of codifying kind of a loose area in the current policy to kind of fix a little bit of issue that might be happening on the hijacking realm.

ROGER CARNEY: Great. Thanks, Rich. That helps, that extra perspective on, yeah, and thanks, Jonathan, for your chat, too, as well. Jody, please go ahead.

JODY KOLKER: Thanks, Roger. I agree with Rich to a point here. I don't have a problem with removing or with 17.5, removing those links because those links could be used for phishing. I think we've all had the same issue or gotten the same security warnings. Don't click on links that are in an email. So actually putting something in here doesn't seem like it's that big of a deal to not allow a customer or registrant to be able to click a link within an email to automatically go through for a transfer to automatically go

through. I agree with Jonathan. You should have a way, a link inside the panel somewhere within the registrar, which would be to authenticate in, etc., to be able to approve the transfer away. I mean, there's nothing here that says that you can't have a link that would take the customer to a login on your website, and then they could go to the place where, if it's hidden somewhere or not easy to get to. So I don't have a problem with 17.5, thanks.

ROGER CARNEY: Great, thanks, Jody. Okay, any other comments on this? Theo, please go ahead.

THEO GEURTS: Yeah, so I'm sort of pondering over the 17.5. Apparently, there's no language that prevents us to put in the control panel of a registrant to expedite a transfer. Not sure how it works with the reseller model, but let's not go there. But two points there. So I don't see anything within the previous points that sort of confirms that we can expedite a process. So that is a little bit of a worry. And secondly, 17.5 is heavily used in the current state of the transfer process. So I'm a little bit worried that by removing it altogether, though the reasons just laid out there, I agree with them. But it also seems that we are sort of missing a couple of bits and bolts here. Thanks.

ROGER CARNEY: Great. Thanks, Theo. Any other comments here? Okay, again, we'll come back to it. But it sounds like there's good support for that. But let's everyone think about it. And again, as we've talked through it, it really helps out, I think, for everybody to see those sides. So I think that's good. And thanks, Caitlin, for pulling us back to this to make sure we hit on it. So, but okay, I think we can move on, and I'll turn this back over to Caitlin.

CAITLIN TUBERGEN: Thank you, Roger. So moving on to recommendation 19. This recommendation, as a reminder, is notification of transfer completion. There were a few comments received here. The first is that there is, in 19.3, one of the bullets says, date and time that the transfer was completed. This commenter is noting that the time should be standardized. And so recommends specifying that it's in UTC rather than whatever particular time zone it may be in so that there's standardization across registrars. The second is that footnote 10, which says this is the registrar of record at the time of the request, should be moved into the body of the recommendation to avoid confusion. That was a similar comment to a previous recommendation as well. Similar to another comment or another recommendation, there was also a comment related to privacy proxy service providers and that the notice should be sent to the underlying customer. One commenter noted that the 24-hour timeframe might not be enough time. And so due to the short timeframe, this commenter is noting that in addition to the elements listed in 19.3, there should also be the inclusion of the identity and contact information of the individual who is making the transfer request. And then lastly, there was a note by a couple of commenters that if the registered name holder receives this notification and did not request the transfer, that there really should be some sort of dispute mechanism that registered name holders can use. And this working group did discuss that and actually has a recommendation later in this package about having further policy work on whether there can be a dispute resolution mechanism just for registrants or if registrants can be added as approved complainants to the transfer dispute resolution policy. So there is a recommendation about that, but that point was noted by several commenters, that there is this weakness with the transfer policy that if there's an issue, there isn't really a uniform mechanism by which registered name holders can challenge an improper transfer. So I'll pause to see if anyone wanted to provide further context on any of those comments or if I missed anything that's important for the working group to consider that was received in public comments.

RICH BROWN: On 19-3, this proposed change, let me move over here. I'd identify and I believe that it's trying to say provide the contact information of the entity that requested the transfer. Well, the losing

registrar wouldn't have that unless the gaining registrar sent that personal information to them or to the registry to then forward it over. Either way, that's not really going to work in today's privacy world. Just kind of wanted to put that out there. It's kind of dead on arrival. Anyway, thank you.

CAITLIN TUBERGEN: Thank you, Rich. I think with that, we can just take a look at the yellow box where there is the marked up language based on these comments. So the first is, again, moving this footnote, which is the registrar record at the time of the transfer request, into the main body of the policy recommendation. There's another parenthetical about the underlying customer. If the registering holder is using an affiliated privacy or proxy service provider. I'll just make a note here in case there were some of you who were not able to attend the last call that with respect to the notification of TAC request, that the working group had issues with this inclusion. I believe the agreement, at least during that call, was that when it comes to notifications, either all notifications need to go to the registered name holder and the underlying customer. But because there is currently an implementation review team working on recommendations related to privacy and proxy service providers, that that was really something for them to standardize about what notifications should be sent and when, since there's a difference between a privacy provider and a proxy provider. So I think that language was rejected in other recommendations just for information.

19.1, again, there's this if different parenthetical related to the language of the registration agreement. That was something that everyone agreed to in previous recommendations, so probably isn't controversial. And then the additions in 19.3 are an addition about coordinated universal time or UTC, so that the date and time the transfer was completed is consistent across all registrars. And then, as Rich just noted, this added bullet, this was a request of a couple of commenters, I believe one commenter, that the identity and contact information of the entity that requested the transfer should be included in this notification.

But I believe Rich just noted that this information, the losing registrar would not have unless the working group were perhaps to make a recommendation that the gaining registrar needs to send this to the losing registrar, then that wouldn't be possible, at least with the way the recommendations are currently constructed. So I will now hand it back over to Roger to see what folks think about these additions.

ROGER CARNEY: Thanks, Caitlin. Okay, Catherine, please go ahead.

CATHERINE PALETTA: Thanks. This is Catherine Paletta from the Registrar Stakeholder Group. I am thinking about this UTC requirement, mostly because I had never heard of UTC before started doing ICANN stuff, and I don't know that it's super accessible to general users. Now I acknowledge that this doesn't prevent me from saying 16:00 UTC, which is X mountain time, name.com being located in Denver. But I'm wondering if other folks feel differently about that or care about that, because obviously I can put multiple time zones.

ROGER CARNEY: I thought the same thing as you did when I read that. And it's like UTC is great because it provides that baseline time that everybody goes back to. But I don't think saying it here in UTC, as you said, I think most people are going to understand whatever time zone or even if it's Eastern, they know, oh, okay, I'm in mountain, so that's two hours different. But I think if we do UTC, which to me is good because it does provide a simple baseline, but I think it has to be able to be other time zones as well, just my thoughts, but Jody, please go ahead.

JODY KOLKER: Thanks, Roger. I'm fine with it being in UTC, but I have a different perspective on this because whenever I read a timeframe and if the time doesn't include a time zone, I'm always wondering, well, what time did they really mean? So whether it's in UTC or in the registrar's time zone or something to that effect, I mean, I just don't want to see a time there. Like this happened at 4:35 PM. Well, that's great, but where? In recognition to the registry, the registrar, or someplace else. So whether it's in UTC or whether it's in the time zone of the registrant or the time zone of the registrar [inaudible] with me, as long as it includes the time zone, thanks.

THEO GEURTS: Great, thanks, Jody. Yeah, and that makes sense. Theo, please go ahead.

THEO GEURTS: Yeah, thanks. So I was struggling with it a little bit also when Catherine posed the question there. And from a technical point of view, UTC is widely used when it comes to databases, backends, development, coding, et cetera, et cetera. So that's pretty normal to think in terms of UTC, but I was wondering, but I'm glad that Jody does not have any objections. We do notifications within UTC. And from now and then, there is some confused registrant or reseller that doesn't understand that it's in UTC. So I was kind of wondering, like, we being a mid-side registrar, how would that compare to a large registrar like GoDaddy? But if Jody sees no problems there, great. I think we can keep the UTC thing, in my opinion. And yeah, and that identity and contact information of the entity that requested the transfer, I'm not a big fan of that also. Thanks.

ROGER CARNEY: Great, thanks, Theo. Yeah, so for the UTC, I wonder if we can expand that and just say, I don't know if we say like at a minimum in UTC or whatever, just so that people can put in, as Catherine said, you know, mountain time if your registrar's there or if your customer's there, whatever it

is. You know, I don't want to say you can only put it in UTC because then I think there'll be a lot of phone calls because it's like, okay, what is that? But anyway, I think we can do something along those lines. But I like UTC as that baseline, as I said, so I think that makes sense to include it as one of the data points in there. Identity and contact information, when I read that, to me, that's the losing registrar, and I think it becomes difficult, but it would be the losing registrar's data of who requested the TAC. And at least that's how I saw the commenter's comment coming through is, are you providing who requested the TAC in this transfer, this notification of completion? So that was just my thought. It wasn't something that had to be passed back and forth or anything. Jody, please go ahead.

JODY KOLKER: I thought the only person that could request a TAC was the registered name holder.

ROGER CARNEY: And any representative. It could be an account holder, anything along those lines. Theo, please go ahead.

THEO GEURTS: I think we are having the same thoughts, but okay, let me shoot. So it is indeed the RNH or that maybe the account holder. And that's the problem there from my point of view. I don't know who the account holder is at a reseller level. Yeah. I have no idea where that's going. So that would be, you know, from a practical point of view, I don't think it would be a major development if we pull the registered information and put that into the notification. But you know, that could be one of those discussions with ICANN compliance when there is a dispute. And then you go like, yeah, well, we don't know what that information is. And then you have a whole back and forward for a couple of months to sort that one out. So that's why I'm not keen on it. Thanks.

ROGER CARNEY: Great. Thanks, Theo. Jody, do you want to follow up?

JODY KOLKER: Yeah, thanks, Roger. Yeah, I'm just not crazy about having it in there just because of compliance, you know, the way that it's written right now is of the entity that requested the transfer. What are we talking about? Are we talking about the TAC? Are we talking about the person that went to the gaining registrar and actually requested the transfer at that point? Right. I would rather just get rid of this. It doesn't sit well with me. Thanks.

ROGER CARNEY: Great. Thanks, Jody. Any other comments on this? And I think that's a good point to call out, Jody, is, you know, is it who requested the TAC, who used the TAC, and along that, or, you know, who came in and, you know, acted in the control panel at the end. So I think it becomes difficult to prove that or even associate it. As Theo kind of touched on in compliance, you know, obviously the registrars are required to maintain this data of transfers for 15 months. So there'll be a trail, but it necessarily won't be a specific person because it could be multiple different users that could have done this. So, okay. I think that, again, the commenter had this idea. So I think as long as we provide the rationale back to them that saying, okay, this is not necessarily a one person or one user kind of thing, and registrars still have to maintain records of their process. So I hope that that works out. But Theo, please go ahead.

THEO GEURTS: Yeah, I think we provided enough rationale why we want this removed in the light, like this was one commenter. You know, if there would have been 50 people who would have made the same comment, that I would have sort of argued now right at this spot, maybe we should even add more flesh

to it why we don't want this. But I think given the light of one comment and the current discussion that we just had, I think that justifies the removal. Thanks.

ROGER CARNEY: Great, thanks, Theo. Okay, any other comments? I think that was all that was in here. I think everyone's good with moving the footnote up. As Caitlin mentioned, you know, we've done this before and the privacy proxy thing is always a tricky thing because that is handled in a different policy. So I don't think we need to include anything in here. And I think that's what we've done before. It gets really tricky. The affiliated part sort of helps, but it still gets to the spot of if the transfer policy requires it and then the policy, well, actually the contract part requires it, then you're getting multiple notifications for the same thing. And so I think the notifications to me is handled for privacy proxy here. And it's already handled in our contract. So I think I don't think we need to have it here. But thoughts? Okay. I think we have talked 19 through. Caitlin, if you want to take us on.

CAITLIN TUBERGEN: Thank you, Roger. So we'll go to recommendation 21 because there were no comments received on REC 20. REC 21 is the revised reasons that a registrar may deny a transfer. At a high level, the comments were mostly related to the first 1A 3.7.1. As a reminder, the current text in the policy says evidence of fraud. However, the group expanded that clause to now include evidence of A, fraud or B, DNS abuse as defined in section 3.18.1 of the RAA. The first comment related to 3.7.1 is a concern about evidence versus proof and how there was an imbalance in the working group with respect to there being a lot of registrar contributions and not necessarily contributions from other groups. And so there's a concern that this kind of gives the registrar a unilateral right to deny a transfer with potential shady evidence or incomplete evidence or proof. And so there was a comment about removing this entirely. There was also a comment about the concern of it being quite broad, and therefore, if a registrar were to invoke this reason as a reason to deny an inter-registrar transfer, that there should be a rationale included as to what evidence the registrar is basing this denial off of. There was a comment also about

restructuring this clause so that it says evidence of fraud or evidence of DNS abuse as defined. I believe that comment was made by ICANN.org from a compliance perspective of making it easier to enforce if it's written in that way. So with that, if we can go to the yellow box so we can see what that looks like. And if possible, if we could make this a little bit bigger because it's not currently legible, at least for me. We could just zoom in a little bit. That might be easier to read. Thank you.

So for 3.7.1, you'll see that now it's broken out as evidence of A, fraud, or B, evidence of DNS abuse as defined in Section 3.18.1 of the RAA. And then the bracketed text was that commenter's request. If the registrar denies a transfer request for this reason, the registrar must provide the specific rationale for denying the transfer request to the registered name holder. So with that, I will pass it back to Roger if anyone wanted to provide additional context related to these comments or a reaction to what the edited text currently reads. Please raise your hand. Thank you.

ROGER CARNEY: Great. Thanks, Caitlin. Yeah, and I think the addition of evidence on B makes sense. I think that was the intent of the working group. And to the point of evidence or proof, I think that was also the intent. It was evidence; it wasn't proof. And I think that the group knows the difference there. And it was that there was some evidence that it's been proven to be DNS abuse. There is evidence to make that decision. As far as providing the rationale, the second part of this, I thought that any time a denial was done that they had to provide that. But I'm not sure if I'm remembering that correctly or not. But I'll turn this over to Ken for his thoughts. Ken, please go ahead.

KEN HERMAN: Thanks, Roger. It's Ken Herman for the record. Yeah, this was mainly our comment. I think that as it was expressed in the comment, we just wanted to see the evidence. Now, I'm not quite sure that's the same as rationale. It may be. But we wanted to be sure that it wasn't just denial because we have evidence of fraud or evidence of DNS abuse as defined, blah, blah, blah, here. And therefore, that's

why we're denying. But we need to be sure that that evidence is presented to the registered name holder so that they can take up the dispute with the registrar involved. And there isn't any concern about withholding the specific materials that might have led to that conclusion. And this is particularly important because while evidence of fraud might be more explicit, evidence of DNS abuse can really cross the line easily into issues that aren't included in the section of the registrar agreement and the way it's defined by ICANN.

And I also wasn't clear, to be honest, whether Recommendation 20 already sort of obliges the registrar to provide whatever evidence. So if somebody can clarify that, I think it would go a long way towards making it clear and settling it for our stakeholder group. So, thanks.

ROGER CARNEY: Great. Thanks, Ken. And thanks for bringing that up. I think that's good clarity that you provided there. And maybe if staff can pull up Recommendation 20 just to see, so everybody has a thought or be able to read 20 and see if it does or not. To your point, that's interesting, Ken, that rationale or reasoning, does that include the actual evidence or at least the concept of that evidence? Does that include that or not? That's a good point to ask. Theo, please go ahead.

THEO GEURTS: Yeah, thanks. So I kind of like the proposed changes. Thanks, Ken, for the clarification. And in my mind, when we talk about a rationale, and if we talk about evidence, why we are denying something in the case of DNS abuse, I don't want to touch upon fraud just yet. But DNS abuse, you know, if you are going that route, you know, and I'm not so worried about a rationale, so that I have something for ICANN compliance. For me, it's the rationale needs to be—it needs to be something that if I run into a dispute about DNS abuse, somebody is doing something that we can define as DNS abuse, we're gonna give you a rationale, we're gonna give you the evidence. Because if you're going to court, I want to make sure that in our initial email exchange or communication, that we presented the evidence that I can tell a

judge like, okay, judge, this is all the evidence we sent. This is the rationale. This is why we are doing it. Because I'm far more worried about that scenario than any ICANN scenario there. Though I will admit, I don't see this much happening in a reality that we need to block transfers out because of DNS abuse. The reality is, you block it, you suspend it, and you never hear anything from the criminals. That is the reality. But I do understand that Ken and his stakeholder group, which is the important thing here to recognize where they are coming from. I mean, they do represent the registered. So that's why I'm actually okay. I haven't read this. It's on the screen now, so I'm not going to comment on that. Thanks.

ROGER CARNEY: Okay, great. Thanks, Theo. I appreciate that. Rich, please go ahead.

RICH BROWN: I was about to mention Section 20 is about, yes, when you deny a transfer request, you must provide the reason. In this case, a registrar would say that there was evidence of fraud or DNS abuse, and that's their reason that they would share. And that's kind of how I read it going forward. Now, this suggestion is adding a new level to this by requesting the actual data that was used for this evidence. And I would like to say as somebody who actually deals with a lot of these things on a daily basis, a lot of the evidence we get includes personal information, or may come from law enforcement, and we are like under a, we can't divulge it. Or there are many reasons why we may not be able to share the evidence, but we can say that there is evidence. So I just wanted to just clarify that.

ROGER CARNEY: No, that's a good point. Yeah. And I think that Ken and yourself are making that distinction that to me, 20 doesn't state, and 2021 doesn't state that you have to provide that evidence. And to Ken's point, is that useful? And obviously it's useful for whoever's getting the denial. I don't know if there's a middle ground, because you're right, Rich, that sometimes you can't share that, at least at the

time. So I don't know if there's a middle ground for 21, that there's something you provide, the evidence that's available or whatever, publicly available, whatever it is. But it is that difference. But Ken, please go ahead.

KEN HERMAN: Yeah, thanks. And Richard, you raise a good point. I'd have to reconfer with my stakeholder group and see what they have to say about that. My initial reaction, not being a lawyer, of course, my initial reaction would be at least that can be disclosed. Although I'm not sure that's enough. But I take your point, and I think it's worth discussing further. I mean, you understand my point, which is really just to, you can't just say, oh, we have evidence of DNS abuse. We have evidence. You've got to really, come on, give us a little bit more. And more to the point, sort of tell us, well, how can we engage in order to be able to rectify? That's kind of what we're getting at.

ROGER CARNEY: Yeah. Thanks for that, Ken. And it'd be good to hear back from the thoughts on that. And again, maybe it's something as simple as providing evidence that, you know, whatever evidence you can provide or whatever it is, because a lot of times you should be able to provide it, you know, hey, spam, whatever, simple enough. But there are circumstances where you wouldn't be able to. So I'll do that. So, Rich, please go ahead.

RICH BROWN: Just wanted to add to the end of that. I'm not, I didn't want to come off as saying I'm against the sharing of the evidence, just that it's hard to share such evidence, and creating a policy that requires a sharing of it is dangerous. But I'd also like to mention that this is still a policy requirement. And even if my registrar says we deny a registrar based on evidence, you can complain to compliance still and compliance can investigate, and we can provide them with the proof necessary. We might not even be

able to share all the data with them. But then again, there are other ways to show that, you know, we received proper evidence and whatnot, other than just outright sharing it through the email. Anyway, that's all I want to say. Thank you.

ROGER CARNEY: Great. Thanks, Rich. Appreciate that. Okay. Let's flip back to 21. I think it's something we can come back on, and maybe Ken can talk to his group about this and walk down that and see if there is a line that we can put in that makes sense. But I think for today, it's a good point. And I think everybody appreciates both sides here. So we can probably get to a figure out this out. But let's go ahead and move on to our next one, Caitlin.

CAITLIN TUBERGEN: Thanks, Roger. So the next one is Recommendation 22. This is the revised reasons that a registrar record must deny a transfer. And there was one suggestion with this recommendation. Specifically, there was a note that in Recommendation 22, the last sentence in the revision notes a lock. However, it's added, it's noted in the last sentence, but not referenced earlier. And so accordingly, the commenters provided draft text to replace that long last sentence to make it more clear. So if we can just scroll down, you can see that the proposed added sentence just notes that in all cases, the objection must be provided by the registered name holder on an opt-in basis. If the registered name holder removes this objection, then the transfer must be permitted within the standard timeframe. So I believe it was the registrar stakeholder group that provided this edit for clarity. So if anybody wants to speak to it, or alternatively, if anyone objects to that text, I'll turn it back over to Roger to see if there are any comments here.

ROGER CARNEY: Great, thanks, Caitlin. Yeah, and I see that the registrar stakeholder group did post it in Namecheap. Follow the second. So if anyone wants to talk specifically about it, that'd be great. Otherwise, yeah, everyone take a read of this and see if it's the intent is similar enough and that it's more clear, obviously a little bit shorter, maybe more direct. So if anyone has any comments here. Okay. Make sure everyone takes a read of this and make sure that they're comfortable with it. It seems to be covering the same basis, but we want to make sure everyone's comfortable with that before we accept it. I just had one other comment I forgot about on 21. George Kirikos did mention something about the issue about referring to the contract about DNS abuse, the definition of DNS abuse being in the contract. And his concern was that the definition could be changed or updated. And I think the definition could be changed or updated. And I think to his comment, I think that was sort of our intent, was we didn't want to define it here. It's defined elsewhere. And it is, you know, something that will probably change over time. So I think that was on purpose. So I just wanted to make sure that we covered that. But Owen, please go ahead on either one of these.

OWEN SMIGELSKI: Yeah, I'm talking about the DNS abuse. I think we should leave it as in the RAA because I was going to say it was harder to change only because it's something that requires a really convoluted voting process for the registrars. But please don't get me back some PTSD regarding that. But I also then realized if we have a definition, say here, trying to change a consensus policy is even more difficult and convoluted, involves a lot of moving parts. So I think we should just keep it in that one place. So it's kind of centralized and unified across all various areas. And if someday in the future, there is a PDP addressing this, you know, a DNS abuse PDP or something, it can deal with that specifically.

ROGER CARNEY: Yeah, great. Thanks, Owen. Yeah. And I agree. And I think George has kind of hinted that a few times in his comments that abuse should probably be handled by a separate working group and probably should. That would be something huge to undertake. But I think you're right. I think

that, again, to me, it adds the flexibility. We don't have to define it here. And if it does change, it's changing for a reason, and most likely because something new comes up that we find. But yes, I think that if it needs to, it can work through a policy development process and be updated that way if anyone actually wanted to take that on. So, okay. That was just the one comment I wanted to pull back to 21. But on 22, are there any other comments? I think that the updated language covers what is being taken out and is a little more clear. But I want everybody to feel comfortable with that. So please take a read. And if you're comfortable or not, bring it up. But I think no comments. We'll move on to the next one, Caitlin.

CAITLIN TUBERGEN: Thank you, Roger. So, the next one is recommendation 24. This was another comment. I believe it was from the registrar stakeholder group. And there was also a related comment from ICANN Org. This is in relation to 1A 3.9.3, where there is a reference to a registrar lock status being crossed out. And specifically, the commenters noted that they think that it would be helpful to add some implementation guidance for that provision, which provides that for Section 1A 3.9.3, a registrar applied into registrar transfer lock is likely the client transfer prohibited EPP status, but a registrar may instead prevent an inter-registrar transfer via some other method. And that's, I think the group previously talked about how registrar lock might be confusing. Generally speaking, that means that the registrar has applied a specific EPP status, but there could be something else the registrar is doing.

So, if you scroll down to the yellow box, it shows that mocked up implementation guidance at the end of that box. So, that was the suggestion from the commenters. And that was the only comment related to this. And REC 24 as a whole is dealing with reasons that a registrar must not deny an inter-registrar transfer request. So, with that, I'll turn it back over to Roger to see if there's any comments on this implementation guidance or comments about the comment that was submitted. Thank you.

ROGER CARNEY: Great. Thanks, Caitlin. Yeah, and I think as Caitlin mentioned, you know, we talked about this multiple times in our discussions that what does that mean? And let's try not to be specific because it can be handled multiple ways. But I think the guidance makes sense and it adds to hopefully helping the IRT go down that path. So, any comments from anyone? Any concerns about adding this? Okay, great. Okay, we've got seven minutes left. So, I'm going to turn this over to Christian maybe to start introducing us to the next big set. There's only a few recommendations, but there's a lot of comments on the next few recommendations. But I want Christian to be able to at least introduce this. I was hoping for more time, but that's okay. Good discussions on prior items. So, but yeah, there's quite a bit of comments on change of registrant data recommendation 25 through 28. But I'll let Christian jump into this and get it kicked off here in the last few minutes. Thanks. Go ahead, Christian.

CHRISTIAN WHEELER: Thanks, Roger. Yeah, I don't know if six minutes is enough time to get through all these. So, we'll probably need to push these to next time. But I think we could probably at least talk about recommendation 25 because that only had, I believe, just kind of one comment about it. So, yeah, so there was one comment with regard to change of registrant data and it's regarding, you've heard of this before, the privacy proxy, the mention of privacy proxy data. So, there was a comment that is a reminder that privacy and proxy services are different and probably shouldn't be grouped together as they're kind of treated differently. So, they were highlighting that the change of proxy service provider would essentially be a change of registered name holder. So, that would be considered a change of registrant data when it's a proxy provider. So, staff went ahead and added in just some slight revision to this text just to take out the proxy aspect of this recommendation from 25.3 and just keeping it to privacy. Happy to hear what the group thinks about that. If more needs to be added or if it's good as is. So, I'll just kind of leave it back up, send it back over to you, Roger.

ROGER CARNEY: Great. Thanks, Christian. Thanks for that. Yeah, and that it's an interesting comment that they bring up. Though the hard part for me is when I read this literally, when you add proxy service, you're doing it at the registrant's request, and it is technically a different registrant. So, I think that that's an interesting issue that they bring up. Changing a proxy service, that gets a little tough because I believe some proxy providers and maybe even some privacy ones change the email address periodically so that this cuts down on spamming and whatever else. At least the RDDS viewable email address gets changed periodically for some privacy and proxy holders, and that's just to cut down on spam and everything. So, I think this is going to be taken carefully when we read this and see if it really is what's intended. Because to me, adding proxy does change the RNH for sure, but does it change the intent is a good question. So, I think that that's something the group should think about and talk about. Any comments on that? Especially you, privacy and proxy specialists. Catherine, please go ahead.

CATHERINE PALETTA: Thanks. Not claiming to be a privacy or proxy specialist, but I think my thought on this is like, yes, this commenter is exactly right. We know privacy services are very different than proxy services, but most people don't. And I think if I'm thinking from a customer's perspective, this is going to be confusing to me, and I don't, I'm not going to appreciate the difference. And so, I think they're, they are right. I just don't necessarily want to change anything because they're technically right. But happy to hear from others if they disagree.

ROGER CARNEY: Great. Thanks, Catherine. Yeah. And that's a good point to bring up is those that are in the business, mix these two up and don't get them right all the time. So, for a registrant, they probably don't even know specifically which one they're using. So, that's interesting. So, but yes, technically, and as you said, when I read it, it's like, oh, yeah, technically. But yeah, so thoughts, concerns with one minute to go. Maybe I'll leave this as something spinning in your head for a week, and we can

come back on it. Plus the few other items that we left open to think about. So, I think this is at a good spot that we can pull back. So, I think this is at a good spot that we can pull back. Catherine, your hand's up.

CATHERINE PALETTA: Yeah. One last comment, which is to say, this, it's complicated by the fact that privacy and proxy services, but I think especially proxy services can be completely unknown to the registrar. And so, when you're changing what is an unaffiliated proxy service, maybe it's your law firm. That's going to look like a change of registrant to the registrar, and they're not going to know that it was a proxy registration the whole time. And so, this, it's further complicated that way, where you are going to treat some proxy registrations one way and some a different way because you don't necessarily know their proxy registration.

ROGER CARNEY: Thanks, Catherine. No, and it is, again, something to think about. And again, I know, and maybe we can get the history because this is a carryover from the change of registrant stuff. So, it's something that we can think about and take a look at. But great discussions today. I think we've made great progress and enlightenment on a few things. So, there's a couple items left open. Take a look at those. And this privacy thing, we'll jump back on starting next week. All right. Thanks, everybody.

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